BPA Policy 120-1

BPA Policy on Policy Management

Leadership and Authority

Table of Contents

120-1.1 Purpose & Background

The purpose of this policy is to define the program for managing enterprise wide internal policies and procedures at BPA. This includes, but is not limited to, the development, review, approval, publication, implementation, validation, and disposition of enterprise wide internal policies and associated enterprise wide procedures.

120-1.2 Policy Owner

The BPA Deputy Administrator is the owner of this policy. Agency Compliance and Governance is responsible for managing the enterprise wide internal policies program at BPA and for implementation of this policy.

120-1.3 Applicability

BPA Policy 110 is applicable to all enterprise wide internal policies and procedures, which are stored in a central repository known as the BPA Internal Policy Library, located on BPA Connection. All BPA federal employees must adhere to all enterprise wide internal policies and associated enterprise wide procedures located in the BPA Internal Policy Library.

120-1.4 Terms & Definitions

A. **BPA Executive Governance Body (Audit and Internal Controls Committee (AICC) at the time of publish):** Oversees most governance and compliance activities and initiatives within BPA. Chaired by the Deputy Administrator, BPA's executive governance body is staffed by senior representatives of tier 1 and 2 organizations, as appointed by the Deputy Administrator.

B. **BPA Internal Policy:** An enterprise wide executive management directive to comply with a desired organizational strategic direction and with applicable laws, regulations, and operational requirements.

C. **BPA Internal Procedure:** Documentation of a standardized and consistent way to implement a BPA enterprise wide internal policy, outlining the tasks and activities to execute a business process. A procedure typically identifies who does what, when, and how, but is still broad enough to apply to the activities of all organizations to which it applies.

D. **The BPA Internal Policy Library**: The official BPA repository and central reference source for enterprise wide internal policies and enterprise wide internal procedures.

E. **Code of Federal Regulations** (CFR): The codification of the general and permanent rules and regulations (sometimes called administrative law) published in the *Federal Register* by the executive departments and agencies of the Federal Government of the United States. The CFR is divided into 50 titles that represent broad areas subject to Federal regulation.

F. **Enterprise Wide:** For the purposes of this policy and for BPA's internal operating policies and procedures published in the BPA Internal Policy Library, enterprise wide refers to those policies and procedures that affect more than one Tier 1 organization.

G. **Policy Road Map:** A long-term plan for the review and development of enterprise wide BPA internal policies based upon BPA's strategic direction, compliance domains and enterprise risk analysis.

H. **Policy Working Group (PWG):** A group led by Agency Compliance and Governance and staffed by policy management representatives appointed by the Vice Presidents and Directors of the business units for which the members work to represent the interests of the organizations and serve as liaisons on all policy planning and policy issue resolution.

I. **Regulation:** A governmental rule or order with the force of law, which may be either substantive or procedural. Regulations are promulgated by an executive agency and may be issued through the Code of Federal Regulations (CFR) or other sources. Regulations specify the details and requirements necessary to implement and to enforce legislation enacted by Congress.

120-1.5 Policy

A. BPA issues enterprise wide BPA Internal Policies and Procedures to define the requirements governing its operations and the conduct, decisions, and actions of its management and employees. The requirements of BPA Internal Policies are binding on all BPA Federal employees.

B. BPA executive management is responsible for BPA Internal Policy content and implementation. BPA Internal Policies are concise and high level.

C. Enterprise wide BPA Internal Procedures associated with BPA Internal Policies are developed by the organization responsible for the policy and are mandatory.

D. BPA Internal Policies and Procedures are managed according to the requirements specified in this document.

E. BPA Internal Policies are published in the BPA Internal Policy Library as established and maintained by the Agency Compliance & Governance organization.

120-1.6 Policy Exceptions

Standards, guidelines, procedures, desk books, work instructions, manuals and other written materials that are limited to the internal operations of an individual business line or work group are outside the scope of this policy.

120-1.7 Responsibilities

A. **Policy Owner:** Ownership of a BPA Internal Policy is designated to the Vice President (VP) level of the business line with primary responsibility for the subject matter. The BPA Administrator, Deputy Administrator, Chief Operating Officer, or Chief

Administrative Officer may delegate policy ownership to the Director or Manager level as documented in BPA's policy on Delegated Authority. The policy owner has the primary responsibility for the policy and assigns resources as necessary to support development and implementation of the BPA Internal Policies for which they are responsible. Policy owners are accountable for implementation and compliance of policies they own.

B. **Policy Writer:** Policy writers author the revision of an existing policy and draft new policies. The policy writer is often the functional subject matter expert (SME) and defines the purpose and scope of the policy. The policy writer is responsible for identifying and responding to conflicts or concerns that arise during review or analysis of a revised or draft new policy and may also responsible for defining and coordinating plans that may include: implementation, change management, communication and training requirements associated with the policy rollout.

C. **Subject Matter Expert (SME):** A subject matter expert is consulted by the policy writer when an existing policy is being revised or a new policy is being drafted. As noted in section 100.7, B. SMEs may also be responsible for writing procedures that accompany or supplement policies. SMEs may also responsible for defining and coordinating plans that may include: implementation, change management, communication and training requirements associated with the policy rollout.

D. **Policy Working Group (PWG):** Provides review and impact analysis of proposed policies (new or revised) and conducts policy sunset reviews. Specifically, the PWG:

1. Validates the purpose and scope of the policy.

2. Identifies conflicts or gaps with existing and/or proposed policies and insures their resolution prior to publication.

3. Defines impact analysis parameters.

4. Conducts and/or coordinates the impact analysis.

5. Reviews draft policies prior to submission to the policy owner for adherence to policy management program principles, standards, and process.

6. Coordinates sunset reviews for and disposition of authorized policies.

E. **Policy Coordinator:** The Policy Coordinator has primary responsibility for the implementation of the policy management program as defined by this policy. This position is appointed by the Chief Compliance Officer. The Policy Coordinator:

1. Serves as liaison to executive committees, program offices and organizations for matters regarding BPA enterprise-wide internal policy and program management.

2. Serves as Team Lead for staff in the policy program management office.

3. Manages the agenda and workload for the PWG.

4. Maintains policy management and policy workflow procedures, models, plans, templates, and specifications necessary for implementation of this policy.

5. Coordinates the style, format, and content review of draft policies.

6. Publishes authorized policies to the BPA Internal Policy Library and maintains the library.

7. Coordinates communications with the policy owners.

8. Implements the policy disposition decisions of the BPA executive governance body (Audit and Internal Controls Committee (AICC) at time of publish).

F. **Office of General Counsel (OGC):** Provides legal expertise with respect to the review of content, authorization, and legal/regulatory citations associated with each revised or new draft policy.

G. **BPA Executive Governance Body (Audit and Internal Controls Committee (AICC) at time of publish):** Approves the BPA internal policy management system. The group also provides strategic direction to the PWG with respect to policy development and prioritization, reviews and approves the Policy Roadmap, annual policy work plans and schedules, reviews and comments on new and/or updated BPA Internal Policies, and authorizes disposition recommendations derived from policy sunset reviews.

H. **Internal Audit:** Provides evaluation of authorized polices with respect to compliance and effectiveness when required by policy management procedures, the PWG, or as directed by the AICC or the Internal Controls and Oversight Committee (ICOT). Internal Audit refers requests for modifications of a policy to the PWG.

I. **Human Capital Management (HCM):** Provides coordination between the PWG and the Labor Relations organization as appropriate with regard to review requirements of revised and draft new BPA internal policies. HCM also approves and authorizes organizational functional statements for incorporation into corresponding BPA internal policies as appropriate.

120-1.8 Standards & Procedures

The standard phases applied to BPA Internal Policy management at BPA are captured in the following Policy Lifecycle Model.
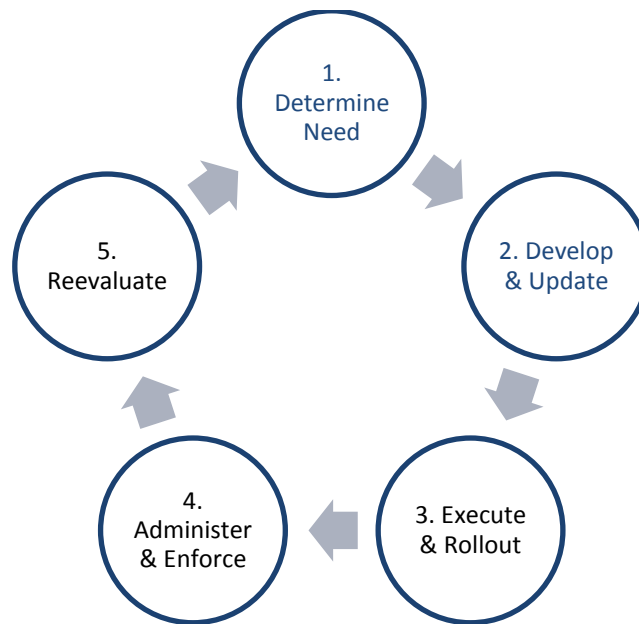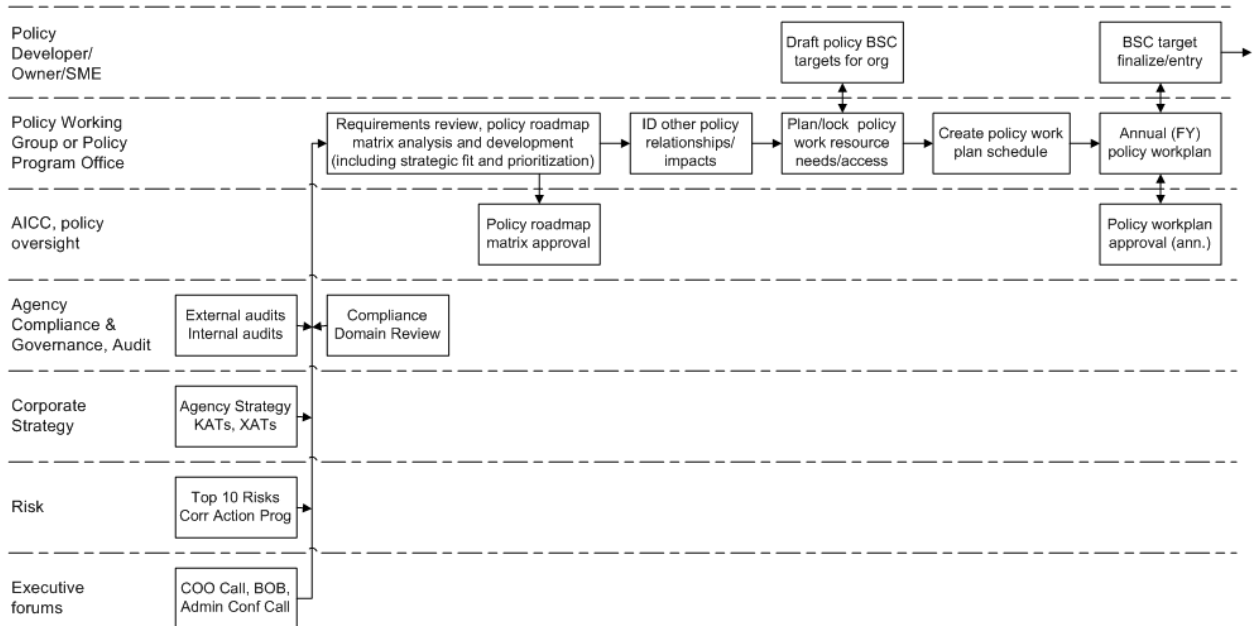

The procedures for policy development, review, approval and publication are established by the PWG as a Policy Workflow and are described in sections 100.8 A through E. The Policy Workflow is based on the five phases of the Policy Lifecycle Model.
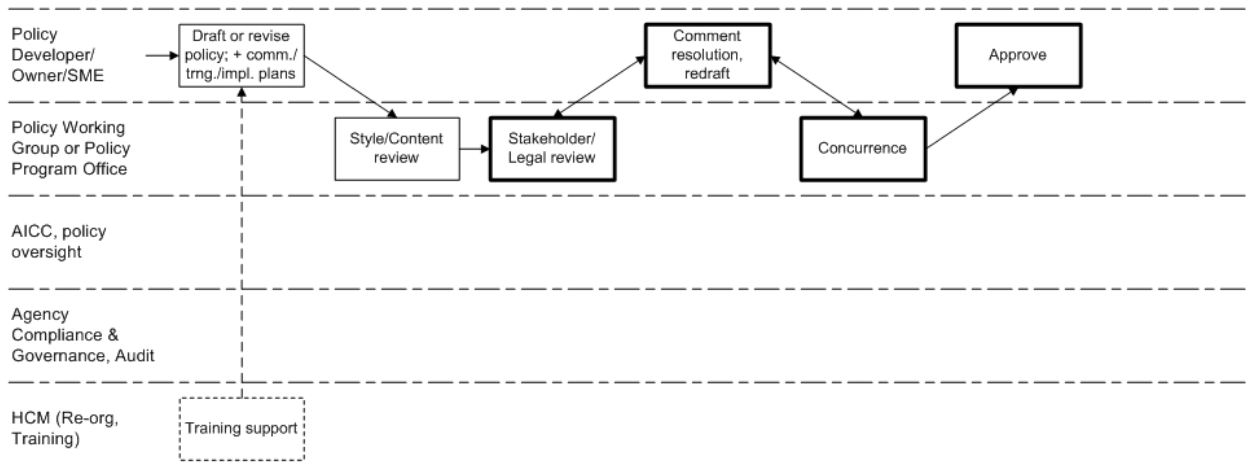
A. **Determine Need**

Steps illustrated in this phase of the Policy Workflow may occur independently of one another to begin the Policy Workflow Process. Each section represents a separate activity and it is not necessary for each action to occur (sequentially, concurrently, or at all) in order for the policy workflow process to move forward.
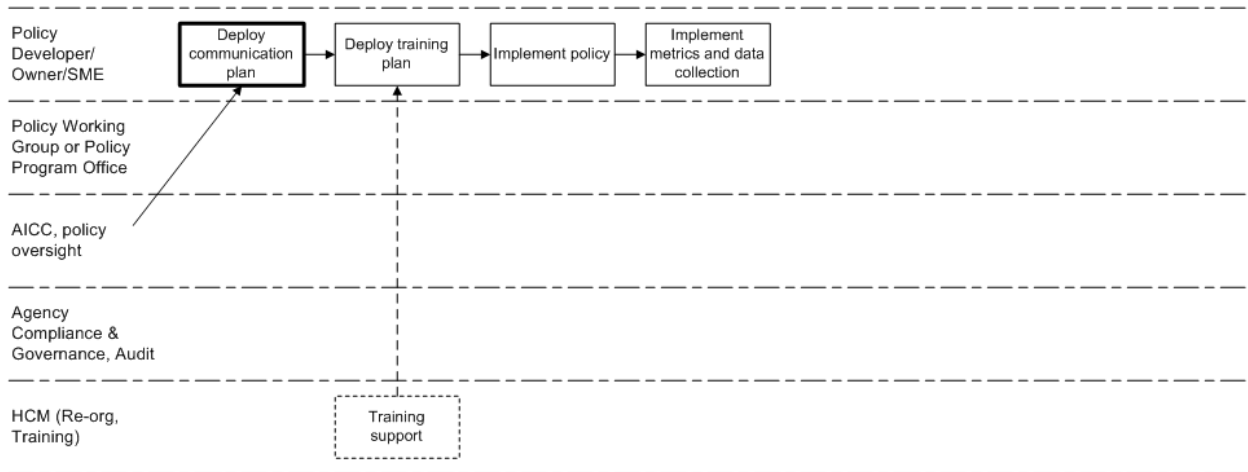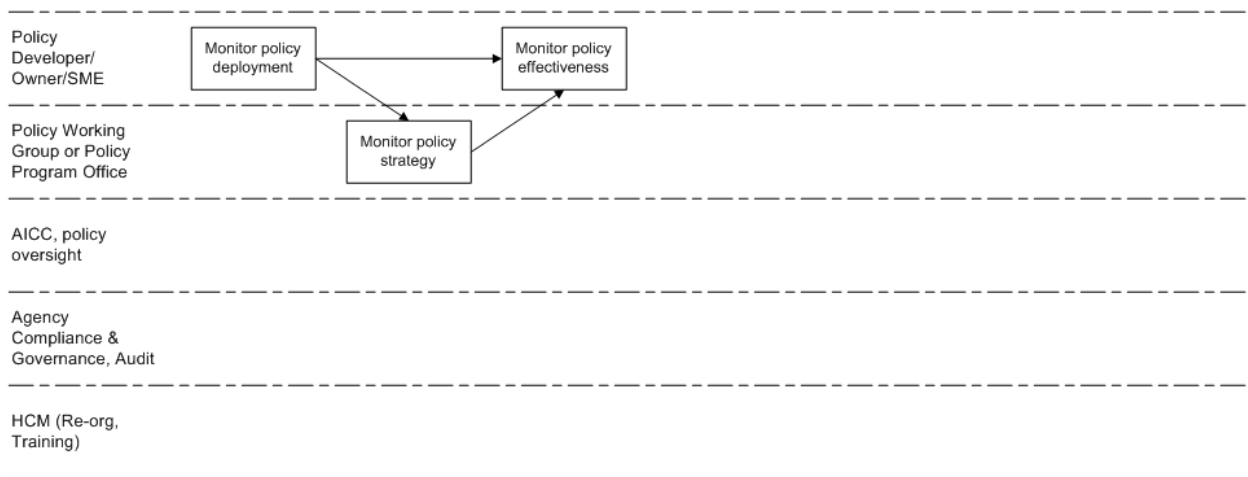
Policy Developer/ Owner/SME		Draft policy BSC targets for org	BSC target finalize/entry
Policy Working Group or Policy Program Office	Requirements review, policy roadmap matrix analysis and development (including strategic fit and prioritization) → ID other policy relationships/ impacts → Plan/lock policy work resource needs/access → Create policy work plan schedule → Annual (FY) policy workplan		
AICC, policy oversight	Policy roadmap matrix approval		Policy workplan approval (ann.)
Agency Compliance & Governance, Audit	External audits Internal audits — Compliance Domain Review		
Corporate Strategy	Agency Strategy KATs, XATs		
Risk	Top 10 Risks Corr Action Prog		
Executive forums	COO Call, BOB, Admin Conf Call		

B. **Develop and Update**

Policy Developer/ Owner/SME	Draft or revise policy; + comm./ trng./impl. plans → ... Comment resolution, redraft ... Approve
Policy Working Group or Policy Program Office	Style/Content review → Stakeholder/ Legal review ... Concurrence
AICC, policy oversight	
Agency Compliance & Governance, Audit	
HCM (Re-org, Training)	Training support

Organization		Title/Subject		Unique ID	
Agency Compliance & Governance		**Policy on Policy Management**		**120-1**	
Author	Approved by	Date		Version	Page
D. Smiley	**G. Delwiche**	**October, 21, 2014**		**1**	**7**

C. Execute and Rollout

Policy Developer/ Owner/SME	→ Deploy communication plan → Deploy training plan → Implement policy → Implement metrics and data collection
Policy Working Group or Policy Program Office	
AICC, policy oversight	
Agency Compliance & Governance, Audit	
HCM (Re-org, Training)	Training support

D. Administer and Enforce

Policy Developer/ Owner/SME	Monitor policy deployment → Monitor policy effectiveness
Policy Working Group or Policy Program Office	Monitor policy strategy
AICC, policy oversight	
Agency Compliance & Governance, Audit	
HCM (Re-org, Training)	

Organization		Title/Subject		Unique ID	
Agency Compliance & Governance		**Policy on Policy Management**		**120-1**	
Author	Approved by		Date	Version	Page
D. Smiley	**G. Delwiche**		**October, 21, 2014**	**1**	**8**

E. **Re-evaluate**

Steps illustrated in this phase of the Policy Workflow may occur independently of one another to begin the Policy Workflow Process. Each section represents a separate activity and it is not necessary for each action to occur (sequentially, concurrently, or at all) in order for the policy workflow process to move forward.
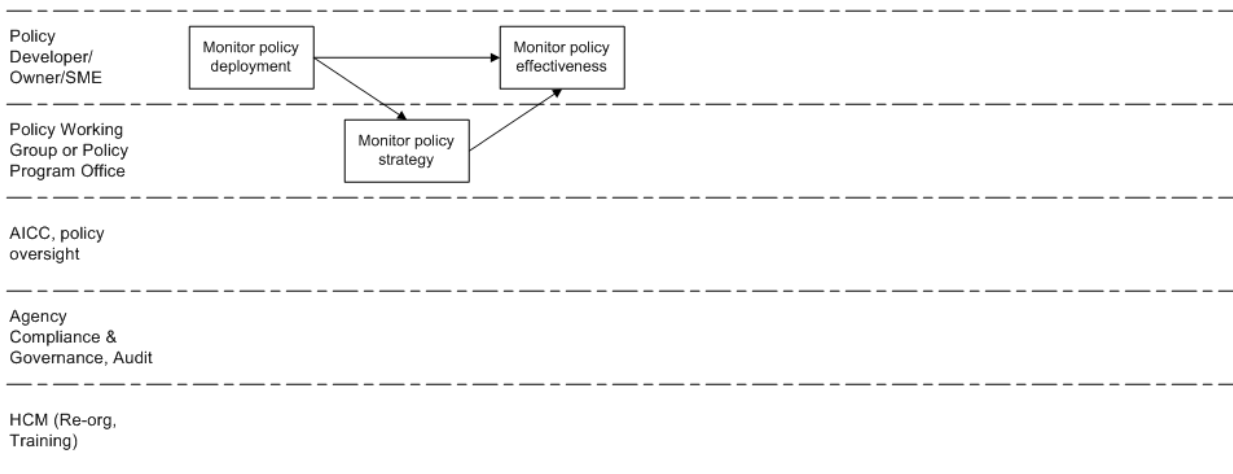
120-1.9 Performance & Monitoring

A. The Policy Coordinator will track the ratio between authorized and unauthorized polices and the ratio between current (within the five year sunset review date timeline) to track the effectiveness of this policy's initial implementation.

B. The PWG will review draft policies prior to submission to the policy owner for adherence to policy management program principles, standards, and process.

120-1.10 Authorities & References

DOE Order 251.1C, The U.S. Department of Energy Departmental Directives Program.

120-1.11 Review

The PWG reviews the BPA Policy on Internal Policy & Procedure Program Management every five years after implementation. The review determines the policy's effectiveness at documenting the standards for the creation, management, and governance of enterprise wide BPA internal operating policies, and confirms the effectiveness of employee access to the BPA Internal Policy Library.

120-1.12 Revision History

Version	Issue Date	Description of Change
1	7/1/2014	Archive BPAM 100 and document new Policy on BPA Internal Policy Management.